

STATEMENT OF SUPPORT

Since 1992, EPA and the Utah Department of Environmental Quality (UDEQ) have been working with the City of Sandy, the Salt Lake City/County Health Department, and Asarco to assess the health risks posed by the impacts of historic smelting and milling activity in Sandy City and to find a way to deal with unacceptable risks. Activities undertaken have included a site investigation, risk assessment (using the Integrated Exposure/Uptake Biokinetic model), preparation of a draft Engineering Evaluation/Cost Analysis, three comprehensive blood lead studies, two time critical soil removal actions, and extensive community education and involvement. In June, 1997, a Working Group comprised of representatives from Asarco, EPA, Sandy City, UDEQ, and the Salt Lake City/County Health Department met to consider whether the actions taken to date have been sufficiently protective and whether additional clean up work is warranted for certain properties on the Sandy Smelters Site. The Working Group also wished to inform EPA on issues of implementability and community and State acceptance of options EPA may be considering. Recognizing that EPA will make the decision about further actions at the Sandy Smelters Site, the Working Group wishes to communicate the following conclusions reached during its discussions:

1. Based on EPA's explanation of the Sandy Smelters Site risk assessment and given the results of the blood lead tests within the Sandy Smelters site study area which show no child exceeding a level of 10 ug/dL blood lead, the Working Group supports an 1800 parts per million (ppm) action level for lead in soil. The City of Sandy, the Salt Lake City/County Health Department, and Asarco believe that the blood lead studies have not demonstrated a health risk; however, they are willing to support additional soil removals in properties with soil lead levels exceeding 1800 ppm.
2. Given the lack of a demonstrated health risk for their citizens, the community leaders expressed a strong desire for closure on this site. They consider any use restrictions, additional monitoring, or other institutional controls on residential property to be unacceptably disruptive to their citizens.
3. UDEQ, the City of Sandy, and Asarco expect that proper implementation of the 1800 ppm lead action level will constitute completion of the remediation of the Sandy Smelters site.
4. UDEQ, the City of Sandy, and Asarco request that EPA, through its Action Memorandum decision document and other appropriate documentation, take the steps necessary to release any restrictions on the entire site in order to remove any stigma from this site associated with the clean up.

SIGNATURES:

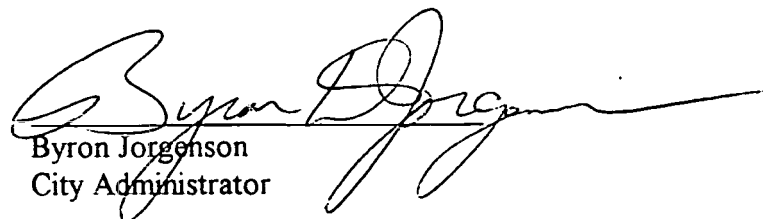
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Date

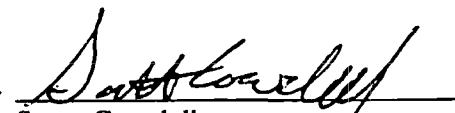
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Date

Date

CITY OF SANDY


Byron Jorgenson
City Administrator


Scott Cowdell
City Councilman

ASARCO, INC.

Donald Robbins
Director of Environmental Services

UTAH DEPARTMENT OF
ENVIRONMENTAL QUALITY

Mark Day
CERCLA Section Manager

SIGNATURES:

CITY OF SANDY

Date

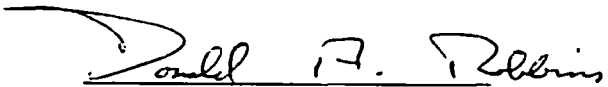
Byron Jorgenson
City Administrator

Date

Scott Caudell
City Councilman

ASARCO, INC.

8-14-97
Date



Donald Robbins
Director of Environmental Services

UTAH DEPARTMENT OF
ENVIRONMENTAL QUALITY

Date

Mark Day
CERCLA Section Manager



State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY DIVISION OF ENVIRONMENTAL RESPONSE AND REMEDIATION

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ERRC-323-97

September 2, 1997

Ms. Bonnie Lavelle
U. S. Environmental Protection Agency
Region VIII
999 18th Street Suite 500
Denver, Colorado 80202-2466

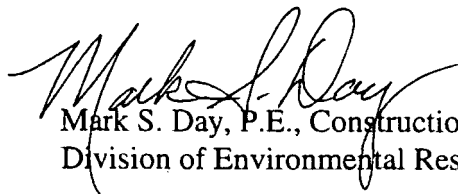
Dear Ms. Lavelle:

I just returned to work today following an extended tour of duty with the military. I am in receipt of a letter requesting signature on the "Statement of Support" which was received in our office on August 14, 1997. As I stated in our last meeting, we would be willing to sign the "Statement" following endorsement by EPA Headquarters in writing that the 1800 part per million lead level at a depth of eighteen inches was acceptable.

I also recall that we specifically indicated that the clean up level needed to be supported and justified using sound, acceptable methods. The "Statement" references clean up levels which are justified using blood lead studies. The Integrated Exposure/Uptake Biokinetic (IEUBK) model is merely referenced in a list of activities. There is no statement that the IEUBK model is the primary methodology used to establish the clean up levels.

Please provide us with the EPA Headquarters endorsement of the proposed clean up levels with a clear statement of justification of those levels and we will consider the endorsement of the remedial action proposed. If you have any questions regarding this please do not hesitate to call Cliff Vaterlaus or me at (801) 536-4100.

Sincerely,



Mark S. Day, P.E., Construction Section Manager
Division of Environmental Response and Remediation

MSD/lwf

